

LAW OFFICES OF
DANIEL A. MCGUINNESS, PC

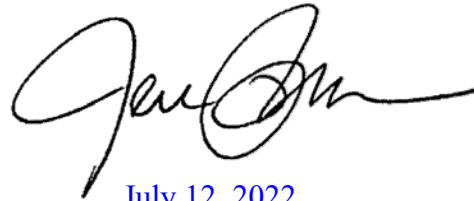
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July 12, 2022

Application GRANTED. Sentencing is hereby ADJOURNED to September 21, 2022, at 3:15 p.m. The Clerk of Court is directed to terminate Doc. #32. SO ORDERED.

VIA ECF

Hon. Jesse M. Furman
United States District Court
40 Foley Square, Room 240
New York, NY 10007



July 12, 2022

Re: *United States v. Jose Zayas*, Case No. 22-cr-243 (JMF)

Dear Judge Furman,

I represent Jose Zayas in the above-captioned matter. I write to respectfully request a 60-day adjournment of Mr. Zayas's sentencing currently scheduled for July 20, 2022 at 3:00pm. I am seeking this request because Mr. Zayas's presentence report reflects a prior conviction in Puerto Rico that was previously unknown to defense counsel and not contemplated in the plea agreement. This conviction raises Mr. Zayas's guidelines range considerably. I am requesting 60 days to obtain the underlying records and have them translated in order to address the issue at sentencing. The Government consents to this request.

I thank the Court for its attention to this request.

Sincerely,



Daniel A. McGuinness

Cc: All counsel (via ECF)